

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

AMERICAN FEDERATION OF MUSICIANS)
OF THE UNITED STATES AND CANADA,)
AFL-CIO,) Civil Action No. 3:20-cv-00318
Plaintiff,)
vs.)
RURAL MEDIA GROUP, INC., and)
RFD-TV, LLC,)
Defendants.)

JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY PROCEEDINGS

Plaintiff and Defendants, by and through counsel, hereby respectfully notify this Court that the Parties have entered into a settlement agreement to resolve this lawsuit. The resolution was agreed to following multiple settlement discussions between the Parties. In light of the foregoing, the Parties request that the Court stay all proceedings and deadlines for a period of thirty (30) days to allow the Parties to fully-execute the terms of the settlement agreement. Once the Parties have fulfilled their obligations under the settlement agreement, the Plaintiff will file a notice of dismissal with prejudice.

WHEREFORE, the Parties respectfully request that this Court enter an Order staying all proceedings and deadlines for thirty (30) days, pending the consummation of the settlement agreement.

DATED: May 6, 2022

Respectfully Submitted:

/s/ Joe P. Leniski

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*Counsel for Defendants Rural Media Group, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served via the Court's online CM/ECF system on this the 6th day of May, 2022.

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/s/ *Joe P. Leniski*
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